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CITY AND COUNTY OF DENVER

DEPARTMENT OF ENVIRONMENTAL HEALTH

Denver, CO 80204

ENVIRONMENTAL PROTECTION
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WELLINGTON E. WEBB
Mayor

October 12, 1998

Mr. Peter Stevenson
U.S. EPA Region VIII
8EPR-SA
999 18th Street, Suite 500
Denver, CO 80202-2466RE: Draft Sampling and Analysis Plan, Work Plan, and Health and Safety Plan
Vasquez Boulevard/I-70 Removal Action

Dear Mr. Stevenson:

We have received and reviewed an October 7, 1998 draft of a sampling and analysis plan for the Vasquez Boulevard/I-70 Removal Action. We also received, on October 8, 1998, a Work Plan for the North Denver Soils Site and Draft Site Health and Safety Plan, both dated September 1998. Thank you for the opportunity to comment on these documents. We have the following comments:

Sampling and Analysis Plan

Page 1, Section 1. We assume that the discussion of what photographic documentation will be provided is included in a separate document.

Page 1, Section 2. We are not aware of any elevated concentrations of cadmium that have been documented as a part of this project.

Pages 3 & 4, Section 4.4. The section describes ambient air monitoring to be conducted with a combination of three Data RAMs and one Mini Ram per property. What are the levels of concern that would cause additional dust control measures or shut down construction activities? Will levels of concern be set as total suspended particulate (TSP) or PM10? Will these devices alarm if levels of concern are exceeded? How will wind direction be monitored and determined? Will upslope and downslope be determined on a regional or site-specific basis? If wind direction is to be monitored at the meteorological station at 4800 Columbine, will the measurements be real-time? How will real-time measurements be relayed to the work crews? A windsock at each residence might provide the necessary real-time information on wind direction. Will the Data RAMs be continuously recording throughout all construction activities or only during excavation? We recommend that you establish levels of concern that will trigger increased dust control measures, and construction shut-down if necessary. In addition, maximum wind speeds should be established, with construction shut-down if these windspeeds (30 mph) are exceeded. We recommend that you consider the levels of concern established for the Asarco Globe site (see attached letter). The narrative states that the equipment staging facility will be equipped with a Data RAM for use as a background location. This location may not be appropriate for background readings, as we understand that the equipment staging facility will also be the location for stockpiling replacement soils, and expect that loading and unloading of replacement soils may generate dust.

Page 4, Section 4.5. Some measurement of metals loading in ambient air in the construction area is necessary in order to verify the absence of metals-contaminated dust during excavation. We recommend that metals analyses be

conducted on filter samples representative of site conditions during excavation. We're not familiar with whether the filter sample collected by the Data RAM would provide the appropriate filter sample that could be correlated with down-wind dust loading for the construction timeframe. The filter sample should be representative of only the duration of construction, and not a 24-hour timeframe.

Page 5, Section 5. Since the Mini RAM and Data RAM are monitoring real-time air quality, we don't understand how the air samples will be split for duplicate analysis. Side-by-side Mini RAM and Data RAM air quality comparisons could be conducted. The devices should be zeroed and calibrated according to manufacturer's operations manuals.

Page 6, Section 8. What measurements will be reported in the monitoring report? Will all Data RAM measurements be reported, or only exceedances, or specified time intervals? All measurements should be archived for to be available for review if requested. Will filter analyses be reported?

Pre-Excavation & Construction Plan, Section 4.2. The section states that excavation activities "will not expose or disturb the root structure of any of the larger trees." Does this mean that no excavation will take place, or will hand-excavation take place sufficient to remove accessible soil without damaging tree roots? To what extent will excavation be prohibited in the vicinity of large trees?

Pre-Excavation & Construction Plan, Section 8. The report should reflect the commitment that truck traffic will be routed along bus routes except when necessary to access the yard under construction. What is the maximum truck speed allowed within residential neighborhoods? In addition, Denver city ordinance requires that all trucks hauling loose materials on Denver streets must be enclosed or covered with appropriate tarpaulins.

Pre-Excavation & Construction Plan, Section 11. What characterization is available that documents the conclusion that the "waste generated from these activities is classified as nonhazardous material."

Pre-Excavation & Construction Plan, Section 14. We request that the contact for the city of Denver regarding construction status be Celia VanDerLoop at 303-285-4065.

Work Plan

Title Page. Please revise the title to reflect the site name of Vasquez Boulevard/I-70.

Section 3.7, page 8. We assume that contaminated soils will be characterized for RCRA hazardous waste, or appropriate documentation is available to demonstrate the materials do not need to be managed as hazardous wastes.

Section 3.11.1.1, page 12. We expect that care will be taken to prevent excessive compaction of topsoil.

Section 3.11.1.2, page 12. We expect that homeowners will be given written guidance on how to establish and care for newly installed sod. We expect that EPA will make provisions to replace or otherwise re-establish sod or other plants that does not survive the winter.

Section 5.0, page 15. We assume that homeowners will be given the opportunity to review site construction and raise any outstanding issues with the OSC, and will be asked for written sign-off, prior to final approval of each residence.

Site Health and Safety Plan

Title Page. Please revise the title to reflect the site name of Vasquez Boulevard/I-70.

Section 4, page 11. We assume that the levels in Table 1 are presented for reference only, and are not considered appropriate in any way for exposures in a residential neighborhood. These levels may be allowable for employee exposures, but must not be allowed to occur in ambient air in a residential neighborhood.

Section 4.2.8, page 19, and Table 2. The narrative states that proper PPE will be worn if airborne dust exposure levels exceed 30 micrograms per cubic meter. Does PPE mean level D or level C in this case? Is it intended that PPE be

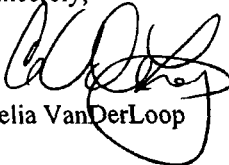
Mr. Peter Stevenson – Page 3
Vasquez Boulevard/I-70 Removal Action

worn if TSP exceeds 30 ug/m3, or if airborne lead exceeds 30 ug/m3? If lead, how will lead concentrations be measured on a real-time basis? Will occupants of neighboring homes also be issued PPE? We recognize that, with proper dust controls, airborne lead levels are unlikely to exceed 30 ug/m3. However, a real-time measurement of TSP is a more reasonable control level to be used as a work shut-down trigger, rather than going to PPE for workers. Conditions that require PPE on workers are not suitable for work in a residential neighborhood, and should cause increased dust control measures and if necessary, work shut-down.

Section 7, page 28. The narrative states that Level C PPE, including air-purifying respirator, will be worn if airborne dust concentrations exceed 0.050 mg/m3. Again, conditions that require use of an air-purifying respirator are not suitable for construction in a residential neighborhood, and must not be allowed to occur. Worker use of air-purifying respirators is likely to cause significant concerns to residents, who may wonder why the worker requires breathing protection while residents are not being provided similar protection.

Thank you for the opportunity to review and comment on these documents. We would appreciate copies of the finalized documents. If you have any questions regarding this letter, please contact me at 303-285-4065 or John Student at 303-285-4067.

Sincerely,



Celia VanDerLoop

Enclosure

cc: Dan Scheppers - CDPHE
Steve Foute – DEH-EPD
Bonnie Lavelle - EPA